

# ELLIS GEORGE LLP

Ellis George LLP  
Carnegie Hall Tower  
152 West 57th Street, 28th Floor  
New York, NY 10019

Stephen P. Farrelly  
212.413.2610  
sfarrelly@ellisgeorge.com

March 4, 2024

**Via CM\ECF**

Hon. Anne Y. Shields, U.S.M.J.  
United States District Court for the  
Eastern District of New York  
Courtroom 840  
100 Federal Plaza  
P.O. Box 840  
Central Islip, New York 11722

Re: *Voe v. Does 1-9*, Case No. 20-cv-5737(RER)(AYS)  
Defendants' First Request for Extension of Time to Respond

Dear Magistrate Judge Shields:

This firm has recently been engaged to act as local counsel for Defendants Wayne Yamamoto and Dwayne Yamamoto. We submit this letter motion pursuant to Section III of the Court's Individual Practice Rules to request a twenty-one-day extension in the time to respond to Plaintiff's Amended Complaint.

We request this three week extension to respond to the Amended Complaint so that Defendants' counsel and local counsel, who have both only been retained in the last week, may familiarize themselves with the file, and so that we may prepare *pro hac vice* admission papers for Defendants' Hawai'ian counsel.

The original deadline to respond was March 6, 2024. Defendants request an extension through and including March 27, 2024 to respond to the Amended Complaint. Defendants have made no previous requests for extensions of time. Plaintiff has consented to our request and agreed with the proposed new deadline.

Respectfully submitted,

s/Stephen P. Farrelly  
Stephen P. Farrelly

SPF:ds

2383009